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June 29, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: WC Docket No. 10-90  
2012 Annual Eligible Telecommunications Carrier Report  
Consolidated Telcom**

Dear Ms. Dortch:

John Staurulakis, Inc. respectfully files the enclosed 2012 annual eligible telecommunications carrier report on behalf of Consolidated Telcom pursuant to Section 54.313(a)(2) through (a)(6) of the Federal Communications Commission's rules (47 C.F.R. § 54.313) and as specified in the Public Notice released on May 8, 2012 (DA 12-729). Copies will also be provided to USAC and the relevant state commission.

Also attached is a letter requesting confidential treatment of the Company's ETC Annual Report under Section 0.459 of the Commission's rules, 47 C.F.R. § 0.459. Additionally, the document contains appropriate indications respecting confidentiality.

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Kuykendall'.

John Kuykendall, Vice President  
Authorized Representative for  
Consolidated Telcom

Enclosure

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
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June 29, 2012

**By Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: WC Docket No. 10-90  
2012 Annual Eligible Telecommunications Carrier Report  
Pursuant to Section 54.313(a)(2) through (a)(6)  
Consolidated Telcom Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client, Consolidated Telcom (the “Company”), hereby requests, pursuant to Section 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection the attached document which is an attachment to the report submitted in fulfillment of the above-referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information of Consolidated Telcom pursuant to Section 54.313(a)(2) through (a)(6) (“Report”).
2. Eligible Telecommunications Carriers (“ETCs”) must file with the Commission the reporting information which is contained in the attachment to the Report pursuant to Section 54.313(a)(2) through (a)(6) of the Commission’s rules and as specified in the May 8, 2012 Public Notice.<sup>3</sup>
3. The information contained in the attachment to the Report for which the Company seeks the withholding from public inspection is data pertaining to the Company’s

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<sup>1</sup> 47 C.F.R. § 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. § 54.313. *See Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission’s Rules*, DA 12-729 (rel. May 8, 2012) (“May 8, 2012 Public Notice”).

Marlene H. Dortch, Secretary  
June 29, 2012

outage. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.
5. With respect to identifying possible exposure to competitive harm, the information contained in the attachment is information that is not customarily released to the public. Because the telecommunications market is highly competitive, release of this information could substantially harm the Company's telecommunications business.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The attachment has also been filed with the North Dakota Public Service Commission under seal.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.<sup>4</sup> The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to the attachment which is marked "Confidential-Not for Public Inspection. Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>4</sup> See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

PUBLIC

EXHIBIT A

- 3 The number of requests for service from potential customers within the designated service area that were unfilled in the past year was  
Eleven

The ways in which the Company attempted to provide services to these potential customers are, as follows:

Six Customers we are waiting for a plow deposit

Five Customers we are waiting for signed easements

- 4 The number of complaints per one thousand handsets or lines was 0.141

Company Name Consolidated Telcom

**EXHIBIT A**

- 2 **Outages:** Detailed information of any outages, as that term is defined in 47 C.F.R. § 45, of at least thirty (30) minutes in duration of each designated service area for any facility which the Company owns, operates, leases, or otherwise utilizes that potentially affect:
- a. At least ten percent (10%) of the end users served in a designated service area, or
  - b. A 911 special facility, as defined in 47 C.F.R. § 45(e).

[illegible]

(If any FCC outage reports were filed showing this information, they may be attached instead.)